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Attorneys for Defendants
Credit Suisse International and Credit
Suisse Securities (USA) LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CASE NO.: 4:13-cv-02783-SBA

MARK LEEVAN, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

CREDIT SUISSE INTERNATIONAL, a
foreign company; CREDIT SUISSE
SECURITIES (USA) LLC, a Delaware
limited liability company; and DOES 1-100

Defendants.

**STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING TIME TO RESPOND AND
CONTINUING CASE MANAGEMENT
CONFERENCE**

1
2 WHEREAS, Plaintiff Mark Leevan filed a Complaint against Defendants Credit Suisse
3 International and Credit Suisse Securities (USA) LLC on June 17, 2013 (the "Action");

4 WHEREAS, Defendant Credit Suisse Securities (USA) LLC was served with the
5 summons and complaint on July 17, 2013;

6 WHEREAS, the undersigned parties anticipate that additional complaints may be filed,
7 and a Lead Plaintiff and Lead Counsel will need to be appointed;

8 WHEREAS, the case management conference is currently scheduled before this Court on
9 September 18, 2013 at 2:30 PM;

10 NOW, THEREFORE, in the interest of judicial economy and good cause showing, the
11 parties, by and through their undersigned counsel of record, hereby agree and stipulate, and the
12 Court hereby orders, as follows:

13 (1) Defendants need not respond to the complaint filed on June 17, 2013;

14 (2) After the appointment of a Lead Plaintiff and Lead Counsel, Defendants and Lead
15 Plaintiff shall meet and confer to determine a schedule for the filing of an amended complaint,
16 and Defendants' response thereto. The parties will file a stipulated schedule for approval by the
17 Court; and

18 (3) The case management conference currently scheduled for September 28, 2013 at
19 2:30 PM shall be continued until January 16, 2014 at 3:00 PM, with the other dates set by the
20 Order Setting Initial Case Management Conference and ADR Deadlines continued accordingly;
21 and

22 (4) No party is waiving any rights, claims, or defenses of any kind except as
23 expressly stated herein.

24 The parties respectfully request that the Court enter an Order approving this Stipulation.
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1 IT IS SO STIPULATED.

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3 Respectfully submitted,

4
5 Dated: August 22, 2013

LATHAM & WATKINS LLP

6
7 By: /s/ Patrick E. Gibbs
Patrick E. Gibbs
8 Attorneys for Defendants
CREDIT SUISSE
9 INTERNATIONAL AND CREDIT
SUISSE SECURITIES (USA) LLC

10
11 Dated: August 22, 2013


NASSIRI & JUNG LLP

12
13 By: /s/ Kassra P. Nassiri
Kassra P. Nassiri
14 Attorneys for Plaintiff
MARK LEEVAN

15
16 **ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED. The parties shall meet and
18 confer prior to the conference and shall prepare a joint Case Management
19 Conference Statement which shall be filed no later than seven (7) days prior
20 to the Case Management Conference that complies with the Standing Order For
21 All Judges Of The Northern District Of California and the Standing Order of
22 this Court. Plaintiffs shall be responsible for filing the statement as well
as for arranging the conference call. All parties shall be on the line and
shall call (510) 637-3559 at the above indicated date and time.

23 Dated: 9/3/2013


24 THE HONORABLE
25 SAUNDRA B. ARMSTRONG
26 United States District Judge
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ATTESTATION CLAUSE

I, Patrick Gibbs, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order Extending Time to Respond and Continuing Case Management Conference pursuant to Civil Local Rule 5-1. I hereby attest that Kassra Nassiri has concurred in this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22 day of August, 2013 at Menlo Park, California.

By: /s/ Patrick E. Gibbs
Patrick E. Gibbs
Attorneys for Defendants
CREDIT SUISSE
INTERNATIONAL AND CREDIT
SUISSE SECURITIES (USA) LLC